

Southern New England Telephone
227 Church Street
New Haven, Connecticut 06510
Phone (203) 771-2718

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Rochelle D. Jones
Director-Regulatory

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 15, 1992

Ms. Donna R. Searcy
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

RE: MM Docket No. 92-260, Cable Home Wiring

Ms. Searcy:

The Southern New England Telephone Company (SNET)
hereby files an original and five copies of SNET's reply
comments in the above proceeding.

Should you have any questions, please contact Paul M.
Beck, Manager - Federal Regulatory at (203) 771-8787.

Respectfully submitted,

A handwritten signature in cursive script that reads "Rochelle D. Jones".

Rochelle D. Jones

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DEC 15 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the)
Cable Television Consumer) MM Docket No. 92-260
Protection and Competition)
Act of 1992)
)
Cable Home Wiring)

REPLY COMMENTS

OF

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

The Southern New England Telephone Company (SNET), pursuant to the Notice of Proposed Rulemaking released November 6, 1992, (NPRM)¹ by the Federal Communications Commission (Commission), hereby respectfully files its reply comments in the above captioned proceeding. SNET agrees with those who advocate policies that encourage customers to choose freely among services offered by competing providers.² Cable operators should be required to provide

¹ The Commission has initiated this rulemaking to implement Section 16(d) of the Cable Television Consumer Protection and Competition Act of 1992. See Pub. L. No. 102-385, 102 stat. ____ (1992).

² See USTA, pg. 2. See also Media Access Project, pg. 1; American Public Power Association (APPA), pg. 4.

consumers and alternate service providers with unrestricted access to cable home wiring.³

SNET states that the Commission's Rules that currently apply to telephone inside wiring offer a useful analogue to cable home wiring.⁴ SNET urges the Commission to apply the same rules to in-place, as well as, new cable home wiring.⁵ Such rules will serve to enhance the Commission's desires about the availability of video dial tone.⁶

SNET agrees with those parties who suggest uniform application of demarcation rules for both telephone inside wire and cable home wiring.⁷ SNET sees merit in a proposed

³ USTA, pg. 4; Bell Atlantic, pg. 5; Pacific Bell and Nevada Bell, pg. 2.

⁴ BellSouth, pgs. i, 2-3; Bell Atlantic, pgs. 1, 4; Pacific Bell and Nevada Bell, pgs. 1-2; APPA, pgs. 14-14; Multiplex Technologies, pg. 1; Consumer Electronics Group of the Electronic Industries Association (EIA/CEG), pg. 5; Blade Communications, et al., (Joint Parties), pgs. 10-11; Wireless Cable Association (Wireless), pg. 8; Building Industry Consulting Services International (BICSI), pgs. 3-4; Media Access Project, pg. 1; American Public Power Association (APPA), pg. 4.

⁵ Bell Atlantic at p. 1. Just as in the case of telephone inside wire, the Commission should apply rules to cable home wiring whether or not the customer has terminated service.

⁶ USTA pg. 4; NYNEX, pg. 3; Bell Atlantic, fn. 2; Utilities Telecommunications Council, pg. 4; Mutliplex Technologies, pg. 5; EIA/CEG, pgs. 5-7.

⁷ See BellSouth pgs. i, 4-10. See also USTA, pgs. 4-5. For example, in single family dwellings, the protector for telephony serves a similar network protection/electrical hazard function as the ground block for cable service.

rule to insure that cable home wiring within the customer's premises, i.e., as defined by the demarcation point, is not owned or controlled by the cable services provider who installed it.⁸

With regard to signal leakage, SNET urges the Commission to adopt policies for cable home wiring that are similar to those adopted for telephone inside wiring and associated customer provided equipment.⁹ The Commission has defined applicable standards in Part 68 for a network boundary and rules to avoid imminent harm to the network.¹⁰

In summary, SNET urges the Commission to adopt rules encouraging competitive access to cable home wiring. These rules should be similar to those for telephone inside wiring thereby permitting alternative providers to connect on a non-discriminatory basis to cable wiring at an appropriate demarcation point.

⁸ See NYNEX, pg. 2. See also Bell Atlantic, pg.5; Utilities Telecommunications Council, pg. 5; Media Access Project, pgs. 2-3. Permitting customer ownership or control of cable home wiring would encourage the use of existing home wiring for the delivery of new services by alternative providers.

⁹ Utilities Telecommunications Council, pg. 6.

¹⁰ See 7 C.F.R. Section 68.3. See also USTA, pgs. 4-5; Bell Atlantic, fn. 13; BICSI, pg. 3; Utilities Telecommunications Council fn. 4.

Respectfully submitted,

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

By: *Rochelle D. Jones*
Rochelle D. Jones
Director - Regulatory
227 Church Street
New Haven, CT 06506-1806
(203) 771-2718

December 15, 1992

CERTIFICATE OF SERVICE

I, Melanie Raycroft, hereby certify that a copy of the foregoing Comments of The Southern New England Telephone Company has been served this 15th day of December 1992, by United States first class mail, postage prepaid, upon the parties listed on the attached Service List.


Melanie Raycroft

Michael E. Glover
Bell Atlantic
1710 H Street, N.W.
Washington, DC 20006

Thompson T. Rawls, III
BellSouth
1155 Peachtree Street, N.E., Suite 1800
Atlanta, GA 30367-6000

Deborah Haraldson
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Nancy C. Woolf
Pacific Bell & Nevada Bell
140 New Montgomery St., Room 1523
San Francisco, CA 94105

Martin T. McCue
USTA
900 19th St., N.W., Suite 80
Washington, DC 20006-2105

Alan I. Robbins
Baller Hamett, PC
Attorney For American Public Power Assn.
1225 Eye Street, N.W.
Washington, DC 20005

James R. Hobson
Donelan, Cleary, Wood and Maser, PC
Attorney For Building Industry Consulting
Service International
1725 K Street, N.W., Suite 850
Washington, D.C. 20005-4078

Suzanne Heaton
Consumer Electr. Group of the
Electr. Industries Assn.
2001 Pennsylvania Ave., N.W.
Washington, DC 20006

Gigi B. Sohn
Media Access Project
2000 M Street, N.W.
Washington, DC 20036

Terry G. Mann
Fish and Richardson
Attorney For Multiplex Technology, Inc.
601 Thirteenth St., N.W., 5th Floor North
Washington, DC 20005

Jeffrey L. Sheldon
Utilities Telecommunications Council
1140 Connecticut Ave, N.W., Suite 1140
Washington, D.C. 20036

Dawn G. Alexander, Attorney
For Wireless Cable Assn. Intl., Inc.
1201 New York Ave., N.W., Penthouse
Washington, DC 20005-3919

John I. Davis
Wiley, Rein and Felding
Attorney For Blade Communications Inc., et al
1776 K Street, N.W.
Washington, D.C. 20006

Sue D. Blumenfeld
Willkie, Farr and Gallagher
Attorney For Tele-Communications, Inc.
Three Layatte Centre
1155 21st Street, N.W.
Washington, DC 20036-3384

William B. Finneran, Chairman
New York State Commission On
Cable Television
Corning Tower Building
Empire State Plaza
Albany, NY 12223

Howard J. Symons
Keith A. Barritt
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, PC
Attorneys For Cablevision Systems Corp.
701 Pennsylvania Ave., N.W., Suite 900
Washington, DC 20004

John H. Muchlstein
Fedarsen & Hought
Attorney For WJB-TV Limited Partnership
180 North LaSalle, Suite 3400
Chicago, IL 60601

W. James MacNaughton, Esq.
Attorney For Liberty Cable Company Inc.
90 Woodbridge Center Dr., Suite 610
Woodbridge, NJ 07095

Robert J. Sachs, Sr. Vice President
For Corporate & Legal Affairs
Continental Cablevision, Inc.
Lewis Wharf, Pilot House
Boston, MA 02110

Henry M. Rivera
Ginsburg, Feldman & Bress Chartered
Attorney For Liberty Cable Company, Inc.
1250 Connecticut Ave., N.W., Suite 800
Washington, D.C. 20036

Frank W. Lloys
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, PC
Attorney For Continental Cablevision, Inc. and
Times Mirror Cable Television, Inc.
701 Pennsylvania Ave., N.W., Suite 900
Washington, DC 20004

Stephen R. Effros, President.
James H. Ewalt, Exec. Vice President
The Community Antenna Television Assn., Inc.
3950 Chain Bridge Road
P.O. Box 1005
Fairfax, VA 22030-1005

Rose Helen Perez, Sr. Staff Counsel
Times Mirror Cable Television Inc.
2381-2391 Morse Avenue
Irvine, CA 92714

James E. Meyers
Mark J. Palchick
B. Jay Baraff
Baraff, Koerner, Olender & Hochberg, PC
Attorneys For TKR Cable Company
5335 Wisconsin Ave., N.W., Suite 300
Washington, DC 20015-2003

John P. Cole, Jr.
Paul Glist
Cole, Raywid & Braverman
Attorneys for Cable Operators, et al.
1919 Pennsylvania Ave., N.W., Suite 200
Washington, DC 20006

Stuart F. Feldstein
Fleischman and Walsh
Attorney For Arizona Cable Television Assn.
1400 16th Street, N.W.
Washington, D.C. 20036

James E. Meyers
Baraff, Koerner, Olender & Hochberg, PC
Attorney For American International, Inc.
5335 Wisconsin Ave., Suite 300/
Washington, DC 20015-2003

Edward W. Hummers, Jr.
Paul J. Feldman
Fletcher, Heald, & Hildreth
Attorneys for Nationwide Communications, Inc.
1225 Connecticut Ave., N.W.
Washington, DC 20036

Daniel L. Brenner
Loretta P. Polk
Attorneys For Natl. Cable Television Assn., Inc.
1724 Massachusetts Ave., N.W.
Washington, D.C. 20036

Deborah C. Costlow
Thomas C. Power
Winston & Strawn
Attorneys For Natl. Private Cable Assn. and
MaxTel Cablevision
1400 L Street, N.W., Suite 700
Washington, DC 20005

Aaron I. Fleischman
Arthur H. Harding
Jill Kleppe McClelland
Fleischman and Walsh
Attorneys For Time Warner Entertainment Co. LP
1400 Sixteenth St., N.W., Suite 600
Washington, DC 20036

Norman M. Sinel
Patrick J. Brant
Stephanie M. Phillips
Bruce A. Henoch
Arnold & Porter
Attorneys For Local Governments
1200 New Hampshire Ave., N.W.
Washington, DC 20036

Eileen E. Huggard, Asst. Commissioner
Cable Television Franchises & Policy
For New York City Department of
Telecommunications and Energy
75 Park Place, Sixth Floor
New York, NY 10007

Paul R. Schwedler, Asst. Chief Regulatory Counsel
Carl Wayne Smith, Chief Regulatory Counsel,
Code AR
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, VA 22204

George Schwartz
549 Fairfield Road
East Windsor, NY 08520